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*Designated Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the Bankruptcy Court*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
IN RE: : Chapter 11
: Case No. 09-50026 (MG)
MOTORS LIQUIDATION COMPANY, *et al.*, :
f/k/a General Motors Corp., *et al.*, :
----- x (Jointly Administered)

**NOTICE OF FILING OF AMENDED EXHIBITS TO MOTION FOR AN ORDER
GRANTING AUTHORITY TO FILE LATE CLASS PROOFS OF CLAIM**

1. On December 22, 2016, the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs (collectively, the “**Plaintiffs**”)¹ filed their *Motion For An Order Granting Authority To File Late Class Proofs Of Claim* (the “**Late Claims Motion**”).² As Exhibits A and B to the Late Claims Motion, the Plaintiffs attached the “**Proposed Ignition Switch Class Claim**” and the “**Proposed Non-Ignition Switch Class Claim**” (collectively, the “**Proofs Of Claim**”). The Proofs of Claim were each filed by a single claimant on behalf of proposed nationwide classes of owners and lessees of vehicles asserting claims against the debtor, Motors Liquidation Company, f/k/a General Motors Company (“**Old GM**”) and/or the GUC Trust.

2. Following the filing of the Late Claims Motion, issues related to the Proposed Non-Ignition Switch Class Claim were stayed and briefing on initial issues related to the Proposed Ignition Switch Class Claim occurred. No responses or objections to the Late Claims Motion have been filed yet.

3. Plaintiffs have amended the Proofs Of Claim and attach to this Notice (i) Amended Exhibit A to the Late Claims Motion—“**Amended Proposed Ignition Switch Class Claim**;” and (ii) Amended Exhibit B to the Late Claims Motion—“**Amended Proposed Non-Ignition Switch Class Claim**” (collectively, the “**Amended Proofs Of Claim**”).

4. Like the Proofs Of Claim, the Amended Proofs Of Claim assert the same legal claims and factual predicates on behalf of the same nationwide group of creditors under the laws

¹ The term “**Ignition Switch Plaintiffs**” means those plaintiffs asserting economic loss claims or persons suffering economic losses who, prior to July 10, 2009, owned or leased a vehicle with an ignition switch defect included in Recall No. 14V-047 the (“**Ignition Switch Defect**”). The term “**Non-Ignition Switch Plaintiffs**” means those plaintiffs asserting economic loss claims or persons suffering economic losses who, prior to July 10, 2009, owned or leased a vehicle with defects in ignition switches, side airbags or power steering included in Recall Nos. 14V-355, 14V-394, 14V-400, 14V-118 and 14V-153.

² See *In re Motors Liquidation Co.*, Case No. 09-50026 (MG) (Bankr. S.D.N.Y. Dec. 22, 2016), ECF No. 13806.

of the 50 states against Old GM arising from the same course of conduct—namely, Old GM’s sale or lease of vehicles with the same specified defects, Old GM’s failure to disclose and active concealment of those specified defects, and Old GM’s false representations regarding the safety of its vehicles. The Amended Proofs Of Claim simply add additional claimants, and citations to the consumer protection and U.C.C. statutes of the remaining states where claimants and similarly-situated creditors are domiciled. Thus, the Amended Proofs Of Claim relate back to the Proofs Of Claim.

5. Accordingly, Amended Exhibits A and B attached hereto should be viewed as the relevant exhibits to the Late Claims Motion in connection with any further briefing or rulings on that motion or under any settlement agreement between the Plaintiffs and the GUC Trust.

Dated: April 24, 2018

Respectfully submitted,

/s/ Steve W. Berman

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